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*Attorneys for Plaintiff
KEB NY Financial Corp.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KEB NY Financial Corp.

Plaintiff,

v.

Edison Property LLC and Sun Hee Chun,

Defendants.

Civil Action No. 1:10-cv-05468-PKC

NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT

PLEASE TAKE NOTICE that plaintiff, KEB NY Financial Corp. (“KEB” or “Plaintiff”), by its undersigned counsel, Duane Morris LLP, will hereby move before this Court, Hon. P. Kevin Castel, United States District Judge, for an order pursuant to Fed. R. Civ. P. 55(b) granting plaintiff’s motion for entry of default judgment in plaintiff’s favor against defendants Edison Property LLC (aka Edison Property 1 LLC) and Sun Hee Chun, individually.

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon the Complaint filed commencing the within action, the Declaration of T. Steven Har filed simultaneously herewith,

the enclosed Clerk's Certificate, and the enclosed proof of service of the summons and complaint, in support of the within motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of default judgment has been annexed hereto.

Dated: New York, New York
December 20, 2010

DUANE MORRIS LLP
Attorneys for Plaintiff, KEB NY Financial Corp.

By: s/ T. Steven Har
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